

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

United States of America,

Criminal No. 08-283 DWF/SRN

Plaintiff,

v.

Steven Mark Renner,

Defendant.

STEVEN MARK RENNER'S REQUEST FOR VOIR DIRE QUESTIONS

Steven Renner respectfully requests that the Court ask the following questions to the prospective jurors:

1. Are you married?
2. What does your wife/husband do?
3. Can you tell me what kind of work you do?
4. How long have you been doing that kind of work?
5. Do you belong to any union?
6. What is your educational background?
7. How old are you?
8. What political organizations do you belong to?
9. What newspapers and periodicals do you read?
10. Were you in the service?
11. What branch of the service?

12. What rank did you have in the (branch)?
13. How long did you serve?
14. Were you ever on any courts martial?
15. Is there anything about this case that bothers you in any way?
16. Assuming that some loved one of yours were standing trial in place of the defendant for the same crime, would you feel satisfied with twelve jurors of the same mind as yours to stand in judgment in the case of your loved one?
17. If you are chosen in this case, do you know of any reason why you could not sit as an impartial juror?
18. Have you ever been employed by the Internal Revenue Service, Minnesota Department of Revenue, or any tax agency? If so, describe.
19. Are you a friend or relative of anyone who works for the Internal Revenue Service, Minnesota Department of Revenue, or any tax agency? If so, describe.
20. Have you ever been a witness in a civil or criminal case? If so, describe.
21. Are you a member of any group or organization dealing with criminal issues? If so, describe.
22. Are you a member of any group or organization dealing with tax issues? If so, describe.
23. The following persons will appear as witnesses for the prosecution. (Read their names.) Are any of you friendly with, related to any of these people or know any of these persons?
24. Have any of you ever been the victim of a crime?
25. Have any members of your family or close friends ever been victims of a crime?
26. Have you or any members of your families ever been the complaining witnesses in a criminal case?
27. Have you ever heard anyone talking about this case before today?
28. Had you heard of this case before today?

29. Since you came here for jury duty, have you seen or heard anything that has led you to form some opinion on this case one way or the other?
30. Have you ever expressed an opinion about this case?
31. Assuming that you were picked as a juror in this case, and you brought in a verdict of not guilty, would you find it embarrassing in the neighborhood that you are living in?
32. Do you now entertain any prejudice against the defendant because of the crime charged?
33. Knowing the charge against Steven Renner, could you give him the same fair trial that you would give him if he were charged with a lesser crime?
34. Do you agree with the proposition that the defendant has no obligation to prove, or disprove, any fact, but may remain silent?
35. You understand, do you not, that the burden of proof is always on the prosecution, and that the defendant need not present any evidence on his behalf? You also understand, do you not, that the defendant need not testify in his own behalf.
36. Do you understand that all the elements of the crime charged must be proven beyond a reasonable doubt, and that if one element is not proven, would you then vote not guilty?
37. If the prosecution fails to prove the guilt of the accused with that degree of moral certainty that amounts to proof beyond a reasonable doubt, would you then vote non guilty?
38. Have you ever been audited by the Internal Revenue Service, Minnesota Department of Revenue or any tax agency? If so, describe the matter and how it was resolved.
39. Have you ever had anyone prepare tax returns on your behalf? If so, were you satisfied or unsatisfied with the results?
40. Have you ever worked with an accountant? Describe the work and whether you were satisfied.
41. Have you or any of your friends and relatives ever worked as accountant and/or tax preparer? If so, identify the person and what that person did.

42. Are you acquainted with or do you know anyone in the U.S. Attorney's Office? Do you know John Docherty? Do you know the defense lawyer, Neal Shapiro?
43. There may be some law enforcement officials who testify in this case. Would you give their testimony more credibility than that of other witnesses?
44. Do you use Twitter, MySpace, Facebook, YouTube, or other such social networking sites, or any weblog sites?
45. The jury will be told not to watch or listen to or read news media about the case until the trial is over, and not to talk with anyone about the case, not even to one another, not even to your relatives or close friends, until it retires to deliberate. Would you find it difficult to follow such an instruction for any reason?
46. Do you have knowledge of Vee Records or Cash Card International?
47. Describe specifically what you know, if anything, about Mr. Renner or any of the companies affiliated with him.
48. Do you consider yourself or any member of your family or any of your friends a victim of the crimes alleged, or do you have empathy for those who say they have been the victim of a crime?
49. Do you have any thoughts or opinions about business executives and salespeople, and business executives and salespeople charged with offenses?
50. Do you have any thoughts or opinions about lawyers, auditors and accountants?
51. Have you ever had a bad experience with a lawyer? If so, describe the experience.

52. Do you have any thoughts or opinions about the criminal justice system, proof beyond a reasonable doubt and presumption of innocence? Do you believe in the ideals?

BERNICK AND LIFSON, P.A.

Dated: November 23, 2009

By/s/ Neal J. Shapiro

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